

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Case No.: 8- 24-72940-AST

EFRAIN GORRE,

Chapter 7

Debtor.

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ROBERT L. PRYOR, Chapter 7 Trustee of the
Bankruptcy Estate of Efrain Gorre,

Adv. Pro. No. 8-24-08099-AST

Plaintiff,

- against -

Continental Trading & Services, Inc.
dba CTS Group, Inc., and Efrain Gorre,

Defendants.

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DEFENDANTS' RULE 26 INITIAL DISCLOSURES

Defendants Continental Trading & Services, Inc. d/b/a CTS Group, Inc. and Efrain Gorre (“Defendants”), by their counsel, LaMonica Herbst & Maniscalco, LLP, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, for its initial disclosures, states as follows:

A. Individuals Likely to Have Discoverable Information

<u>Name</u>	<u>Address & Phone Number (if known)</u>	<u>Subject of Information</u>
1. CTS Group, Inc.	c/o Joseph S. Maniscalco, Esq. LaMonica Herbst & Maniscalco, LLP 3305 Jerusalem Avenue, Suite 201 Wantagh, New York 11793 (516) 826-6500	Defendant
2. Efrain Gorre	c/o Joseph S. Maniscalco, Esq. LaMonica Herbst & Maniscalco, LLP 3305 Jerusalem Avenue, Suite 201 Wantagh, New York 11793 (516) 826-6500	Defendant

<u>Name</u>	<u>Address & Phone Number (if known)</u>	<u>Subject of Information</u>
3. Robert Pryor, Trustee	c/o Pryor & Mandelup LLP 675 Old Country Road Westbury, New York 11590 (516) 997-0999	Plaintiff
4. Gabriel Gorre	c/o Joseph S. Maniscalco, Esq. LaMonica Herbst & Maniscalco, LLP 3305 Jerusalem Avenue, Suite 201 Wantagh, New York 11793 (516) 826-6500	Non-Party Witness
5. William J. Camera, CPA	Camera & Ford, LLP 555 Broadhollow Rd #330 Melville, New York 11747 (631) 465-0476	Accountant Third Party Witness

B. Documents That May Be Used To Support Defendants' Claims

Pursuant to Rule 26(a)(1)(A)(ii), documents that the Defendants may use to support the answer and affirmative defense comprise documents that the Plaintiff already has in its possession, custody or control and/or are publicly available or documents in the possession, custody or control of the Plaintiff or any Witness including, without limitation, the following:

1. All pleadings, filings and exhibits annexed thereto in the Debtor's bankruptcy case.
2. Bank statements and cancelled checks from the Debtor's bank account with his wife.
3. Petition, schedules and statement of financial affairs in the bankruptcy case of Efrain Gorre ("Debtor"), Case No. 24-72940 (AST).
4. Books and records of CTS regarding its tax returns and loans received from insurance.
5. Bank statements and cancelled checks from Debtor's bank account with his son Gabriel Gorre.

Defendants reserve the right to supplement these responses pursuant to Rule 26(e) of the Federal Rules of Civil Procedure in the event that further discovery and/or developments identify additional documents that Defendants intend to use to support the answer and affirmative defenses.

By listing any documents, Defendants do not concede that such document is relevant or admissible for any purpose.

C. Computation of Damages Claimed

Damages will be determined at trial.

D. Insurance Agreements

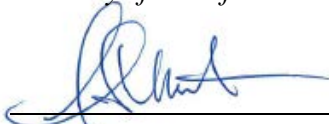
None.

Defendants reserve the right to supplement these disclosures as additional information becomes available, or if the answer and affirmative defenses are later amended and/or supplemented.

Dated: February 5, 2025
Wantagh, New York

LaMONICA HERBST & MANISCALCO, LLP
Attorneys for Defendants

By:



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